

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

## UNITED STATES' MOTION FOR AND NOTICE REGARDING DETENTION

COMES NOW the United States of America by Henry C. Leventis, United States Attorney, and Rachel M. Stephens, Assistant United States Attorney, and moves for detention of the defendant provides the following notice regarding detention of the defendant pending resolution of his supervised release violation.

Pursuant to Federal Rule of Criminal Procedure 32.1(b)(1) and 18 U.S.C. § 3143(a), the United States intends to establish at the preliminary hearing in this matter that there is probable cause to believe that the Defendant has violated the terms of his supervised release. Once so established, the United States respectfully submits that the Defendant, by operation of statute and rule, "shall" be detained unless the Defendant can show by clear and convincing evidence that the Defendant will not flee or pose a danger to the community. *See* 18 U.S.C. § 3143(a)(1). The United States respectfully submits that, based on the supervised release violation warrant issued by the District Court, it is appropriate to detain the defendant pending the preliminary hearing on his supervised release violation, and remain detained until a hearing on the merits of the supervised release violation.

Respectfully submitted,

HENRY C. LEVENTIS  
United States Attorney

By: *Rachel M. Stephens*  
Rachel M. Stephens  
Assistant United States Attorney  
719 Church Street, Suite 3300  
Nashville, TN 37203  
Rachel.Stephens2@usdoj.gov  
(615) 401-6655

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed with the U.S. District Court Clerk via CM/ECF. A copy will be sent to the attorney for the defendant via email once that person is known.

*/s/ Rachel M. Stephens*  
Rachel M. Stephens